

ROBBINS, RUSSELL, ENGLERT, ORSECK, UNTEREINER & SAUBER LLP

1801 K STREET, N.W., SUITE 411 L  
WASHINGTON, D.C. 20006  
PHONE (202) 775-4500  
FAX (202) 775-4510  
www.robbsrussell.com

Lawrence S. Robbins

(202) 775-4501  
lrobbins@robbsrussell.com

December 23, 2017

**VIA EMAIL & FIRST CLASS MAIL**

Representative K. Michael Conaway  
Representative Adam Schiff, Ranking Member  
U.S. House of Representatives  
Permanent Select Committee on Intelligence  
Capitol Visitor Center HVC-304  
U.S. Capitol Building  
Washington, DC 20515

Dear Representative Conaway and Ranking Member Schiff:

I represent David Kramer, who as you know appeared voluntarily this past Tuesday at a closed-door session of the House Permanent Select Committee on Intelligence to answer questions regarding, among other areas, his interactions with Christopher Steele concerning the so-called dossier prepared by Mr. Steele. Both before and during the interview, various Members and staff, including both of you and Mr. Patel, assured Mr. Kramer and me that both the fact of Mr. Kramer's appearance, as well as the contents of his interview by the Committee, would be treated with the utmost confidentiality.

Early Friday afternoon, not three days after receiving these repeated assurances of confidentiality, I received an email from Stephen Ryan, counsel for Michael Cohen. That email, attached to this letter, informed me that he had been contacted by someone from the House, who in turn urged that Mr. Ryan call me to discuss matters arising from Mr. Kramer's interview.

That same day, I left a message with Mr. Ryan's assistant saying I was responding to his email request to speak to me. A few hours later, Mr. Ryan called me back. At the outset – and before he said anything of substance – I made clear to Mr. Ryan that, contrary to the suggestion in his email, our clients did *not* share a common interest, and therefore that anything he chose to tell me would fall outside the ambit of any privilege. He said he understood.

Mr. Ryan then proceeded to tell me that someone from the House (which I took to mean the House Intel Committee) had informed him that (a) Mr. Kramer had spoken with Mr. Steele; (b) Mr. Steele had told Mr. Kramer that certain facts regarding Mr. Cohen contained in the dossier were inaccurate; and (c) it would be helpful to Mr. Cohen's ongoing defense if I would

Representative K. Michael Conaway  
Representative Adam Schiff, Ranking Member  
December 23, 2017  
Page 2

be willing to confirm, and perhaps expand on, the information already conveyed to Mr. Ryan concerning Mr. Kramer's discussions with Mr. Steele.

I advised Mr. Ryan that I could neither confirm nor deny anything he had been told by his source. I also told Mr. Ryan that I regarded it as disgraceful that someone from the Committee had chosen to reach out to him with purported information regarding Mr. Kramer's confidential testimony. Mr. Ryan asked me whether I would at least agree not to write a letter along these lines to the Committee; I reminded him that I had told him at the outset that our clients did not share a common interest, and that I would therefore act solely with Mr. Kramer's interests in mind.

It would be difficult to overstate the extent of my client's and my dismay and disappointment that the explicit and repeated assurances of confidentiality have turned out, almost overnight, to be so completely unreliable. As we stated at the interview, my client has sought, at some personal peril, to cooperate with the Committee; yet this clear breach of the explicit promises of confidentiality leaves us with no confidence – none – that information Mr. Kramer provided will be adequately safeguarded from public disclosure.

Very truly yours,

*Lawrence S. Robbins / A.E.U.*

Lawrence S. Robbins

cc: Nick Ciarlante  
Kash Patel  
Mark Stewart  
Wells Bennett  
Maher Bitar  
Shannon Green

**From:** Ryan, Stephen <SRyan@mwe.com>  
**Sent:** Friday, December 22, 2017 12:29 PM  
**To:** Robbins, Larry  
**Subject:** can you call me please--possible joint privilege issue.

My client: Michael Cohen  
Your client-Mr. Kramer (sp?)  
Dossier issue. A House person suggested I connect.  
Thanks.

**Stephen M. Ryan**  
Partner

McDermott Will & Emery LLP | The McDermott Building | 500 North Capitol Street, N.W. | Washington, DC 20001  
Tel +1 202 756 8333 | Mobile +1 202 251 5343 | Fax +1 202 756 8087

[Biography](#) | [Website](#) | [vCard](#) | [Email](#) | [Twitter](#) | [LinkedIn](#) | [Blog](#)

\*\*\*\*\*  
This message is a PRIVILEGED AND CONFIDENTIAL communication. This message and all attachments are a private communication sent by a law firm and may be confidential or protected by privilege. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained in or attached to this message is strictly prohibited. Please notify the sender of the delivery error by replying to this message, and then delete it from your system. Thank you.  
\*\*\*\*\*

Please visit <http://www.mwe.com/> for more information about our Firm.